



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

August 24, 2022

Via ECF

Hon. John P. Cronan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: SEC v. Pierre, 19 Civ. 10299 (JPC)

Dear Judge Cronan:

Plaintiff Securities and Exchange Commission ("SEC") respectfully requests that the briefing schedule for the SEC's motion for summary judgment be extended by 8 additional business days in order to allow the five-member Commission itself to complete the process of considering whether the SEC should seek any monetary relief against Defendant Rules Pierre ("Pierre") and Relief Defendant R. Pierre Consulting Group, LLC, given Pierre's sentence in the parallel criminal action, *United States v. Pierre*, 19-cr-783 (SAS) (S.D.N.Y.). The SEC's summary judgment decision is currently due on September 2, 2022. Should the Court grant the SEC's request, the new briefing schedule would be as follows:

- SEC files its motion for summary judgment: on or by September 14, 2022
- Pierre files his opposition to the motion: on or by December 14, 2022
- SEC files its reply brief: on or by January 10, 2023

This is the SEC's second request for an extension of the briefing schedule for the motion. Because Pierre is *pro se* and incarcerated, the SEC has been unable to confer with Pierre as to whether he consents or objects to this request. Under the circumstances, the SEC respectfully submits that Pierre and the defunct relief defendant entity he controlled would not be prejudiced by this short delay in the briefing schedule.

Respectfully submitted,

/s/ Todd D. Brody
Todd D. Brody
Senior Trial Counsel

cc: Defendant Rules Pierre **The request is granted. Plaintiff's motion for summary judgment shall be filed by September 14, 2022; Defendant's opposition shall be filed by December 14, 2022; and Plaintiff's reply shall be filed by January 10, 2023.**

SO ORDERED
Date: August 25, 2022
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan".
JOHN P. CRONAN
United States District Judge